NUS CORPORATION

C-34-9-6-371

TO: FILE

DATE: SEPTEMBER 30, 1986

FROM: ROBIN L. SMITH

COPIES: G. LATULIPPE

SUBJECT: RESPONSE TO COMMENTS;
SITING STUDY

FILE COPY

1. Page 1-1 - The last line of the first paragraph should read: "as material dewatering and treatment or leachage treatment." This change will be made to the text after public review.

2. Page 2-1 - No specific descriptions of the methods or procedures used to approach this task (i.e. identification of sites) are given. As explained in the text, no new investigations were conducted to identify sites for this study. Potential sites were identified through the use of reports on previous studies. The majority of sites were identified as part of the Route 6 Bridge replacement project. Specific information can be found in the report entitled "Environmental Assessment, Replacement of the New Bedford - Fairhaven Bridge, New Bedford, Massachusetts." This report was published on May 7, 1985 by the U.S. Department of Transportation Federal Highway Administration and Massachusetts Department of Public Works. In addition, several sites were developed as part of the NUS Feasibility Study of remedial actions alternatives for PCB hot-spots in the Achusnet River Estuary.

3. Page 2-1 - No references or informational sources are given. A reference list is attached.

4. Page 2-1 - The Route 6 Bridge Study appears to provide a majority of information on location of sites, yet it is unclear as to who performed the study and what procedures were followed.

   Please see the response to question 2.

5. Page 2-1 - Concerning the Conrail property, would access for a pipeline transporting dredged material be a limiting factor?

   A conservative approach was taken in the ranking process concerning site access. It was assumed that road transport of dredged materials would be necessary at this site. Therefore, obtaining access for a pipeline would be a favorable condition but not a necessary condition.

6. Page 2-8 - The first alternative, channelization and covering of Acushent River sediments, was eliminated primarily because it "would permanently destroy the estuary as a water resource." Since this factor is considered in the following ranking scheme for all sites (Section 2.1.5, pg. 3-8) this alternative should be ranked with the other alternatives, rather than eliminated on the basis of certain factors.

In order to evaluate this alternative on the same basis as the other disposal sites reviewed in the siting study, the assumption holds that only sediments above the Coggeshall Street Bridge would be dredged. This would reduce this suggested alternative to the hydraulic control and sediment capping option considered in the NUS Feasibility Study. In other words, the "closed-off" estuary would not serve as a disposal site per se for all dredged sediments, but rather sediment would be covered in placed and dredging of contaminated sediments would be eliminated. Therefore, several ranking factors change substantially and make this alternative difficult to rate on the same basis. As mentioned, this option has already been ruled out. In addition to the primary reason for elimination of this alternative due to the permanent destruction of the estuary as a water resource, specific negative impacts were considered. These include permanently inhibiting a free tidal exchange through the bridge opening, partially filling wetland by the sediment cap, totally prohibiting acess to the lower harbor from above the bridge, altering fish migration routes and eliminating migration access to the remaining open water areas above the bridge, and decreasing waterfront property values. Also, the need to extend the channel into the deeper portions of the estuary near the bridge opening and the placement of an effective underwater sediment cap introduce particulary difficult engineering features to this alternative.

7. Page 3-3 - This factor (depth to bedrock) could incorporate qualitative data on bedrock (e.g. fracturing, type of rock) as well as depth.

   References containing this data were not available.

8. Page 3-4 - Permeability should be a major factor in considering the characteristics of the underlying sediments.

   Information on the permeability of sediments is not available at this time. We are in agreement that this is an important factor and should be considered in any further analysis of proposed disposal sites.

9. Page 3-4 - Quantitative information on geotechnical characteristics of the core samples of sediments is not provided. The USACE Upper Estuary geotechnical program will provide site specific geotechnical information for further evaluation.

   Information on physical characteristics of core samples of sediments can be found in reference number 9. Results of the USACE Upper Estuary geotechnical program will provide further site specific geotechnical information, however, results of this study were not available in time for incorporation into the preliminary siting study.

10. Appendix A - No worksheets are provided for ratings that were input to the quantitative evaluation program.

    The worksheets are attached. The assignment of the rating values is further discussed in Section 3.2 of the text and on Table 3-1. The rating values correspond to the site descriptions.

REFERENCES

1. Wetlands Identification and Assessment, Achushnet River Estuary, New Bedford, Massachusetts, April 1985. U.S. Environmental Protection Agency, TS-PIC-85072, Environmental Monitoring Systems Laboratory, Las Vegas, Nevada.

2. New Bedford North Quadrangle, Massachusetts, 7.5 Minute Series (Topographic), 1979. United States Department of the Interior Geological Survey.

3. Environmental Assessment, Replacement of the New Bedford - Fairhaven Bridge, New Bedford, Massachusetts, May 9, 1985. U.S. Department of Transportation Federal Highway Administration and Massachusetts Department of Public Works.

4. Buzzards Bay Strategy and FY85 Workplan (Draft), January 17, 1985. U.S. Environmental Protection Agency, Region I, Commonwealth of Massachusetts Division of Water Pollution Control, Office of Coastal Zone Management, and Division of Marine Fisheries.

5. Approximate Bedrock Surface Elevations, New Bedford North Quadrangle, Hydrogeologic Inventory of Ground Water Resource, June 1986. NUS Corporation, Pittsburgh, Pennsylvania.

6. Bathymetric Map of the New Bedford Harbor between Wood Street and Coggeshall Street, 1986. U.S. Army Corps of Engineers.

7. Land Use and Point Source Inventory, New Bedford, Massachusetts, August 1982. U.S. Environmental Protection Agency, TS-DIC-2025, Environmental Monitoring Systems Laboratory, Las Vegas, Nevada.

8. Ownership History, New Bedford - Fairhaven, January 20, 1986. Internal Correspondence - To: Robin Smith, From: Martha Meyers Lee. NUS Corporation, FIT I, Bedford, Massachusetts.

9. New Bedford Harbor Superfund Site, Achushnet River Estuary Study, June 1986. U.S. Army Corps of Engineers, New England Division, Materials and Water Quality Laboratory, Hubbardston, Massachusetts.